

U.S. Department of Justice  
Washington, DC 20530

OMB NO. 1124-0002; Expires February 28, 2014

**Supplemental Statement  
Pursuant to the Foreign Agents Registration Act of  
1938, as amended**

For Six Month Period Ending 06/30/12

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No.

Blank Rome Government Relations LLC

6025

(c) Business Address(es) of Registrant

Watergate Office Building  
600 New Hampshire Avenue N.W.  
12th Floor  
Washington, DC 20037

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**

3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

Formerly CRM-154

FORM NSD-2  
Revised 03/11

## 4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
See Attachment 1		

## (b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
See Attachment 1				

## 5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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## 6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

N/A

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Trust Company of the Marshall Islands ("TCMI")  
Moroccan American Center for Policy ("MACP")

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☒

Exhibit B<sup>4</sup> Yes ☐ No ☒

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3 (Formerly CRM-157) sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4 (Formerly CRM-155) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

(1) TCMI: Mike Dyer participated in meetings at the World Bank on behalf of TCMI, and Ashley Davis, Mike Dyer, and Ian Comisky participated in client meetings relating to potential meetings with federal departments.

(2) MACP: Blank Rome has worked with MACP to communicate with principals and staff of the executive and legislative branches of the federal government and educate them on U.S.-Moroccan relations and Morocco's commitment to securing a permanent resolution of the Western Sahara issue, with the express purpose of encouraging U.S. actions that promote Moroccan sovereignty, security, and prosperity. Blank Rome also provided strategic advice to MACP on the dynamics of U.S. foreign policy decision-making and distributed information provided by MACP to its contacts in the Washington foreign policy community.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Blank Rome did not engage in any political activity on behalf of TCMI.

Blank Rome engaged in political activity on behalf of MACP by (1) communicating with principals and staff of the federal government and (2) distributing information prepared by MACP to those contacts.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> The term "political activity" means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

#### 14. (a) RECEIPTS-MONIES

If no, explain why.  
See Attachment 2

Date	From Whom	Purpose	Amount
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Total

If yes, indicate the date the Exhibit D was filed.      Date \_\_\_\_\_

If yes, furnish the following information:

Received by NSD/FARA Registration Unit 07/30/2012 11:53:19 AM

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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**Total**

(PAGE 7)

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See Attachment

3

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

## V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>

Yes ☒ No ☐

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☐

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

MACP

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☒ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams  
☐ Advertising campaigns ☒ Press releases ☒ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☒ Public officials ☐ Newspapers ☐ Libraries  
☒ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☒ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



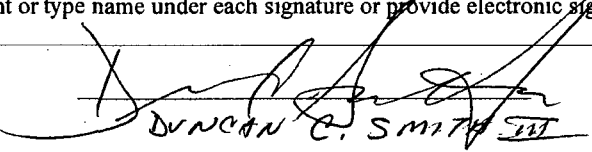
**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>13</sup>)

July 30, 2012

  
DUNCAN C. SMITH III

<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

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# ATTACHMENT 1

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**Question 4(a)**

<b>Name</b>	<b>Position</b>	<b>Date Connection Ended</b>
J. Caleb Boggs	Partner/Principal	4/27/12
Thomas Z. Cheplo	Partner	6/15/12
Peggy A. Clark	Of Counsel	3/19/12
Susan A. Cobb	Of Counsel	3/8/12
Melissa Cortese Foxman	Senior Advisor	4/13/12
Keith E. Gottfried	Partner	3/30/12
Barbara D. Linney	Partner	5/31/12
Charles E. Wagner	Of Counsel	3/31/12

**Question 4(b)**

<b><u>Name</u></b>	<b><u>Residence Address</u></b>	<b><u>Citizenship</u></b>	<b><u>Position</u></b>	<b><u>Date Assumed</u></b>
Henry F. Schuelke, III	1401 E Central Ave, PO Box 676, Mayo, MD 21106	USA	Partner	5/1/12
Lawrence H. Wechsler	20 Farmington Ct., Chevy Chase, MD 20815	USA	Partner	5/1/12
William B. Shields	1588 Vestry Rd., Wantagh, NY 11793	USA	Of Counsel	5/1/12
Susan Leahy	2201 N St. NW #714, Washington, DC 20037	USA	Of Counsel	6/18/12

**Questions 22 and 23:** Blank Rome receives from MACP all informational materials disseminated on MACP's behalf. MACP labels the materials with the disclaimer required by Section 4(b) prior to providing them to Blank Rome. In addition, MACP files with DOJ copies of all materials provided to Blank Rome. Thus, Blank Rome answered yes to questions 22 and 23 even though Blank Rome did not actually file or label the materials itself.

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# ATTACHMENT 2

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**Question 14(a)*****MACP Receipts***

<b>Date</b>	<b>From Whom</b>	<b>Purpose</b>	<b>Amount</b>
1/27/12	MACP	Payment for services	\$25,000
6/5/12	MACP	Payment for services	\$75,000

***TCMI Receipts***

<b>Date</b>	<b>From Whom</b>	<b>Purpose</b>	<b>Amount</b>
2/6/2012	Administrative Control Services, Inc.	Payment for services	\$2,901.60
3/7/2012	Administrative Control Services, Inc.	Payment for services	\$1897.20
4/30/2012	Administrative Control Services, Inc.	Payment for services	\$1,116.00
7/3/2012	Administrative Control Services, Inc.	Payment for services	\$13,595.50
7/30/2012	Administrative Control Services, Inc.	Payment for services	\$17,220.00

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# ATTACHMENT 3

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**Question 15(a)**

Below is a chart of the contributions of short-form registrants to the Blank Rome PAC, followed by a spreadsheet of the PAC's political contributions.

Registrant	Amount
Ashley Davis	\$2500
Mike Dyer	\$5000
Kristi Remington	\$250

## Blank Rome PAC - 2012

Committee	Date	Amount			State
Ed Royce for Congress	1/13/2012	\$1,000	Royce	Ed	H R-CA-40
National Republican Senatorial Committee	1/18/2012	\$5,000			
John Sullivan For Congress, Inc.	1/23/2012	\$1,000	Sullivan	John	H R-OK-1
Democratic Congressional Campaign Committee	1/26/2012	\$5,000			
National Republican Congressional Committee	1/26/2012	\$5,000			
Scott Brown for US Senate Committee Inc.	1/30/2012	\$1,000	Brown	Scott	S R-MA
Friends of Joe Pitts	1/30/2012	\$1,000	Pitts	Joe	H R-PA-16
Nadler for Congress	2/2/2012	\$1,000	Nadler	Jerry	H D-NY-8
Committee to Elect Howard Wallack	2/2/2012	\$500	Wallack	Howard	H R-UT-2
Friends of Bennie Thompson	2/9/2012	\$1,000	Thompson	Bennie	H D-MS-2
George Allen for US Senate	2/9/2012	\$1,000	Allen	George	S R-VA
Lisa Murkowski for US Senate	2/9/2012	\$1,000	Murkowski	Lisa	S R-AK
Betty Sutton for Congress Committee	2/13/2012	\$1,000	Sutton	Betty	H D-OH-13
Jim Gerlach for Congress Committee	2/13/2012	\$1,000	Gerlach	Jim	H R-PA-6
Democratic Senatorial Campaign Committee	2/16/2012	\$5,000			
Alaskans for Don Young	2/23/2012	\$1,000	Young	Don	H R-AK
Niki Tsongas Committee	2/28/2012	\$1,000	Tsongas	Niki	H D-MA-5
Menendez for Senate	2/29/2012	\$1,000	Menendez	Robert	S D-NJ
Upton For All of Us	2/29/2012	\$1,000	Upton	Fred	H R-MI-6
Carper For Senate	3/5/2012	\$2,500	Carper	Tom	S D-DE
Pat Meehan for Congress	3/5/2012	\$1,000	Meehan	Pat	H R-PA-7
Mulvaney For Congress	3/5/2012	\$1,000	Mulvaney	Mick	H R-SC-5
Wicker for Senate	3/5/2012	\$1,000	Wicker	Roger	S R-MS
Alaskans for Begich	3/9/2012	\$1,000	Begich	Mark	S D-AK
Chris Coons for Delaware	3/19/2012	\$1,000	Coons	Chris	S D-DE
Citizens to Elect Rick Larsen	3/19/2012	\$1,000	Larsen	Rick	H D-WA-2
Larson for Congress	3/19/2012	\$1,000	Larson	John	H D-CT-1
Bob Corker for Senate 2012	3/19/2012	\$1,000	Corker	Bob	S R-TN
National Republican Congressional Committee	3/19/2012	\$5,000			
Brian Higgins for Congress	3/27/2012	\$1,000	Higgins	Brian	H D-NY-27
Volunteers for Shimkus	3/28/2012	\$1,000	Shimkus	John	H R-IL-19
Friends of Congressman Tim Holden	4/2/2012	\$1,000	Holden	Tim	H PA-17
Boehner for Speaker	4/2/2012	\$1,000	Boehner	John	H R-OH-8
Citizens for Prosperity in America	4/12/2012	\$1,500	Toomey	Pat	S R-PA
Adam Smith for Congress Committee	4/17/2012	\$1,000	Smith	Adam	H D-WA-9
Keep Nick Rahall in Congress Committee	4/19/2012	\$1,000	Rahall	Nick	H D-WV-3
Friends of Jim Clyburn	4/19/2012	\$1,500	Clyburn	Jim	H D-SC-6
Eric PAC	4/19/2012	\$2,500	Cantor	Eric	H R-VA-7
Roskam for Congress	4/19/2012	\$1,000	Roskam	Peter	H R-IL-6
The Bill Keating Committee	5/2/2012	\$1,000	Keating	Bill	H D-MA-10
Hatch Election Committee Inc.	5/2/2012	\$1,000	Hatch	Orrin	S R-UT
Jeff Miller for Congress	5/2/2012	\$1,000	Miller	Jeff	H R-FL-1
Walden For Congress	5/2/2012	\$1,000	Walden	Greg	H R-OR-2
Duncan for Congress	5/8/2012	\$1,000	Duncan	John	H R-TN-2
Hoyer for Congress	5/14/2012	\$500	Hoyer	Steny	H D-MD-5
Jim Himes for Congress	5/14/2012	\$1,000	Himes	Jim	H D-CT-4
Mike McIntyre for Congress	5/14/2012	\$1,000	McIntyre	Mike	H D-NC-7
The Reyes Committee, Inc.	5/14/2012	\$1,000	Reyes	Silvestre	H D-TX-16
Bob Goodlatte for Congress Committee	5/14/2012	\$1,000	Goodlatte	Bob	H R-VA-6
National Republican Senatorial Committee	5/16/2012	\$5,000			
Comite Pierluisi Inc.	5/29/2012	\$1,000	Pierluisi	Pedro	H D-PR
Hoeven for Senate	5/29/2012	\$1,000	Hoeven	John	S R-ND
Democratic Senatorial Campaign Committee	6/7/2012	\$5,000			
Democratic Senatorial Campaign Committee	6/7/2012	\$5,000			
Lou Barletta for Congress	6/7/2012	\$1,000	Barletta	Lou	H R-PA-11
National Republican Congressional Committee	6/7/2012	\$5,000			
McConnell Senate Committee '14	6/11/2012	\$2,500	McConnell	Mitch	S R-KY



**Blank Rome PAC - 2012**

Committee	Date	Amount	State			
Collins for Senator	6/12/2012	\$1,000	Collins	Susan	S	R-ME
Courtney for Congress	6/18/2012	\$1,000	Courtney	Joe	H	D-CT-2
People for Derek Kilmer	6/18/2012	\$1,000	Kilmer	Derek	H	D-WA-6
The Grassley Committee	6/18/2012	\$1,000	Grassley	Chuck	S	R-IA
Buck McKeon for congress	6/19/2012	\$1,000	McKeon	Howard	H	R-CA-25
Moore for Congress	6/25/2012	\$1,000	Moore	Gwen	H	D-WI-4
Allyson Schwartz for Congress	6/25/2012	\$1,000	Schwartz	Allyson	H	D-PA-13
Team Emerson	6/25/2012	\$1,000	Emerson	Jo Ann	H	R-MO-8
National Republican Senatorial Committee	6/29/2012	\$5,000				